

Response to Comments Table, Energy Chapter

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Page #, Ref.	Commenter	Comment	Response
General	B.K Richards; A4NR	Nuclear energy needs to be addressed	The Commission should consider and add policies and strategies as appropriate, recognizing that the County is pre-empted in the field of radiological health and safety.
General	HBA	Focus on existing buildings instead of new construction	Addressed; see IS 1.2.3, 3.1.2, 3.2.2, 3.4.1, 3.4.3; Policies E 4.2, E 4.3
General	HBA	Encourage the private sector to stop selling incandescent light bulbs	The COSE promotes energy efficiency, but the County does not typically get involved with the sale of such products. The State is expected to phase out these bulbs over time.
General	Steven Ela	Energy producing systems that connect to the grid can supply energy to the county.	Comment noted. The County needs to support both commercial renewable energy projects and distributed energy in order to achieve the objectives of the Energy Chapter such as a sustainable energy supply and increased use of renewable energy.
General	Carissa Alliance for Responsible Energy (CARE)	Include word “local” throughout in regard to supply of energy	“Local” energy lacks a rational basis for policy. It must be acknowledged that the county is part of a regional energy grid. Opportunities to use renewable energy resources such as wind, tidal, wave, geothermal, and solar need to be taken advantage of where they occur and transmitted to consumers in areas where they don’t occur. The same is true for most other resources that we depend on.
Intro.	B.K. Richards	Acknowledge that the County has limited authority in the areas of energy supply to manage expectations	While the County’s ability to affect change may be limited, this chapter seeks to use the authority the County has in this field.
Intro.	B.K Richards	Five key things are missing from the Introduction: 1. The county is a major energy exporter 2. Energy utilization is directly tied to air quality 3. High energy efficiency standards will attract or repel businesses due to cost 4. Measurement awareness of energy use 5. Tools to solve problems (e.g. AB 811)	1. The county is a net exporter of energy; however, there doesn’t seem to be a purpose for including this statement. 2. Mentioned at top of page 5.2 3. Conservation will reduce individuals’ energy costs and will require less capital investment in energy facilities. 4. Measurement and feedback is a key to energy conservation at County facilities where the County can control energy use 5. See IS 1.2.3 (page 5.7)
Intro.	LOCAC	“Abundant resources” should be changed to “limited resources.”	The county has abundant resources that can and are used to generate energy such as wind, solar, tidal, wave, geothermal, and fossil fuels.
5.2	B.K Richards	Move 2030 Challenge sidebar opposite efficient building standards	Noted. It will be moved if space allows
5.2	Sierra Club, LOCAC	Insert word “non” in 4 th paragraph	Revise: “In contrast, nuclear power, fossil fuels such as coal, oil and natural gas, or hydroelectric are <u>non</u> renewable.”
5.3	Sierra Club	Insert new paragraph regarding review of renewable energy projects	The proposed paragraph seeks to treat renewable energy projects more severely than other proposed projects. This is contrary to the intent of the chapter. At the very least, renewable energy projects should be treated in a manner similar to other energy and non-energy projects.

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5.3	B.K Richards; HBA	"Buildings account for nearly half of the total energy used in the US" is misleading. California uses much less energy in the building sector than the nation at large due to Title 24 requirements.	Revise: "Buildings account for nearly half of the total energy used in the United States. In 2006, electricity and natural gas consumption by residential, commercial, and industrial uses in the unincorporated areas of the county contributed 24% of total community-wide greenhouse gas emissions. Those uses they represent a significant portion of the county's nation's consumption of energy and raw materials and waste output."
5.4	CARE	Revise 1 st bullet at top of page: "Avoiding reducing impacts to sensitive biological and natural resources..."	Revise: "Avoiding significant reducing impacts to sensitive biological and natural resources from nonrenewable and resource-consumptive energy sources; and..."
5.5	CARE	Revise item 3): "...The revisions will seek to remove any barriers to facilitate the use of renewable energy such as wind, solar, ..."	Removing barriers that prevent implementation of public policy choices is a key to success of a policy document. It goes beyond facilitation.
5.5	LOCAC	A lot of talk about energy efficiency, but how about cost-effectiveness?	Cost-effective is assumed. If an activity is not cost effective, it will not get done.
5.6 Goal E1	B.K Richards	The policies overreach. The County has a limited role.	This is a local policy document. While superior jurisdictions (e.g., State and Federal) have a large role (perhaps largest), this chapter seeks to identify what the County can do as its part. Also, this goal acknowledges that local areas are moving at different speeds towards sustainable energy supplies (e.g. Berkeley, Sonoma County).
5.6 Goal E1	Sierra Club	Revise: "The County will move toward a sustainable supply of <u>minimum carbon energy for all energy users within the geographic boundary of the County, in cooperation with the Cities.</u> "	Goals should be written to include only those concepts germane to the goal. In this example, "all energy users within the boundaries of the County" is redundant and adds verbiage without adding much value. "In cooperation with the cities" assumes that the cities are interested in cooperation; the County should not add cities to this goal without ensuring that the cities are actually interested.
5.6 Policy E 1.1	A4NR	Add IS: <u>"Collaborate with local and state agencies and Pacific Gas & Electric Company (PG&E) to develop renewable energy resources at the utility's Diablo Canyon site".</u>	On page 5.20, add: <u>"Implementation Strategy E 6.3.1 Existing Energy Production Sites Collaborate with property owners of existing energy production sites to develop renewable energy projects where appropriate."</u>
5.6 IS 1.2.1	Sierra Club	Amend CCA IS	Revise: <u>"Develop a portfolio of local energy sources that can supply electricity that is cost-effective and low-risk, such as Community Choice Aggregation."</u> Determine if Community Choice Aggregation (CCA) or a similar program is a cost-effective and low risk strategy to increase use of renewable energy. If CCA is a feasible option, consider joining the program.
5.7 IS 1.2.2	North County Watch	Add new IS.2.2 A: "Facilitate the installation of local renewable	Addressed by IS 3.2.2 and Policy E 6.6

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		alternatives, such as solar panels, on business and private rooftops through streamlining the permit process and authorizing a reduction in property tax basis as an incentive.”	
5.7 IS 1.2.2	B.K. Richards	Is there an existing Energy Contingency Plan?	Revise: “Implementation Strategy E 1.2.2 Update the existing Develop a Countywide Emergency Energy Contingency Plan Collaborate with local agencies and energy providers to update the existing develop a Countywide Emergency Energy Contingency Plan to meet....”
5.7 IS 1.2.2	B.K. Richards	This has little to do with sustainability and shouldn't be subsidiary to Goal E 1. Is this in the Safety Element?	This IS is appropriate under Goal 1 because it's part of the framework to develop local control of energy decisions and assure that local energy needs will be met. If energy resources are more sustainable, there will be less chance of interruption occurring due to some distant event.
5.6/5.7	B.K Richards	It seems that AB 811 offers a simple way of jump-starting increased use of distributed energy and improved building energy performance. Shouldn't this rise to become a major goal? This is a chance to move from words to action.	AB 811 and similar programs are included in IS 1.2.3. However, AB 811 is not without obstacles to successful implementation. The County should not place too much reliance on this one program.
5.7 IS 1.2.4	B.K Richards	It doesn't make sense for an entity like a county to have a portfolio standard. This, at the earliest, would be a possibility after the implementation of a CCA-sanctioned entity.	Agree. The correct terms were not used. Revise : “Implementation Strategy 1.2.4 <u>Use of Local Renewable Energy</u> Renewables Portfolio Standard <u>Develop a mix of local renewable energy and set countywide goals for use of renewable energy. Assess local renewable energy resources and establish a renewables portfolio standard for the County or in conjunction with other counties. The renewables portfolio standard will take maximum advantage of locally available renewable energy resources.</u> ”
5.8 Policy E 1.4 Methane	B.K. Richards	This is a natural for a goal with attendant implementation strategy stating how much and by when. Should methane capture percentage be another measure for annual reporting in the Annual Resource Summary Report? Don't all of the wastewater systems already capture (most) methane for their digesters?	Many wastewater systems capture methane, but not most or all of it. The County recognizes this point; however the County does not operate any wastewater plants or landfills. Monitoring and reporting of methane capture at wastewater treatment plants are outside of the County's operational and regulatory control. Great care must be taken in developing policies and strategies for which the County has no operational control. Each wastewater treatment plant operator (cities and special districts) should prepare a GHG report and action plan to reduce emissions. This might be a better vehicle for developing a measurable goal or objective.
5.8 Policy E	LOCAC	"Encourage waste-burning biomass facilities as a method of producing	If impacts cannot be mitigated, the project will not be consistent with this policy. Public policy

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1.5 Waste Burning		electrical energy where environmental and air quality impacts can be mitigated." Can they really be mitigated? Should they? Maybe burning is not clean enough. Someone or some area will suffer.	can not guarantee that no one will experience an impact from a particular decision.
5.8 Policy E 1.5 Waste Burning	NCAC	Not a good idea. Mitigation or air quality impacts unrealistic. Would generate severe pollution. Contradiction with AQ policies.	Comments noted, but no evidence is given to support the conclusions.
5.9 IS 2.1.1	LOCAC	Did Public Works require the Los Osos Wastewater Treatment Plant to apply energy efficient uses?	Please refer to that project's EIR and accompanying reports. This IS would require County Energy Use Policy to address all facilities operated by the County.
5.9 Policy E 2.2	B.K. Richards	This policy implements Goal E 2. It doesn't seem strong enough to get the County to its 20% reduction by 2020 goal. Will Goal E 2 be reported upon in the Annual Resource Summary?	Per discussions with County General Services, using this IS will lead to achieving the goal of a 20% reduction. Staff will bring a proposal to include this in the Annual Resource Summary Report to the Board of Supervisors within the next year.
5.9 IS 2.2.1	B.K Richards	This list suggests that there are other facilities not covered. Why not just say "all facilities" from now on? Would the results from this reporting show up in the Annual Resource Summary? Is there some kind of new energy or GHG report to the public?	The GHG inventory identified that some County buildings are not maintained by the GSA. Private owners responsible for their operations are not expected to be part of this IS. The GHG inventory will report on the results every 5 years.
5.10 Goal 3	Sierra Club	Revise Goal E 3: "Energy efficiency and conservation will be promoted in all development required in both new and existing development with appropriate financial framework."	Revise: "Energy efficiency and conservation will be promoted in all development required in new and existing development."
5.10 Policy E 3.1	HBA	Replace "Ensure" with "Encourage." Small infill lots will not have the land, economies of scale or fiscal resources to meet such as broad requirement.	The policy is written broadly enough to allow all types of development to reduce reliance on non-sustainable energy sources.
5.10 Policy E 2.3	LOCAC	"Promote water conservation for all water users..." How about promoting gray water?	Addressed. See Policy WR 4.6 for graywater
5.11	LOCAC	Individual responsibility to limit energy use, e.g., wearing a coat vs. turning up the thermostat, shorter showers, efficiently planned trips, public transportation, car pooling, walking, bicycling. Is driving an addiction?	Individual behaviors are part of education and outreach. The programs cited in IS 3.2.1 and 3.2.2 will include education.
5.11 IS 3.1.1	HBA	"Incorporate on-site renewable energy systems in new development" has the same issues as Policy 3.1	Agree. Revise: "Implementation Strategy E 3.1.1 <u>Where feasible</u> , incorporate renewable energy systems in new development. Incorporate on-site renewable energy systems (i.e., solar or wind powered) in new development.
5.12 Policy E 3.4	North County Watch	Revise: "Offer incentives to conserve energy and reduce the Urban Heat Island. (GBP6)"	The urban heat island effect is addressed by IS 4.4.2 on page 5-16.

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5.12 IS 3.4.1	North County Watch	Revise: "Encourage and assist voluntary actions by owners of existing commercial and residential buildings for energy efficiency retrofits, such as the installation of solar panels, wind turbines, <u>ceiling insulation, vents, green roofs, cool roofs, natural lighting, and other long-term, permanent energy conservation installations.</u> "	Trying to make a complete could lead to loopholes in the IS. The list does not need to be exhaustive.
5.12 IS 3.4.2	North County Watch	Revise: Amend ordinances, design plans, <u>circulation plans, transportation plans, road specifications, reduce or eliminate billboards, reduce or eliminate non-essential exterior lighting</u> and procedures as feasible to create incentives to conserve energy <u>and reduce the Urban Heat Island. Authorize a reduction in property tax basis for the installation of long-term permanent energy conservation installations.</u>	Revise: "Amend ordinances, design plans, and procedures as feasible to create incentives to conserve energy." The list of plans to be amended does not need to be exhaustive. The fiscal implications of reducing the property tax needs to be considered by the Board of Supervisors.
5.12 IS 3.4.3	North County Watch	Revise: "Encourage homeowners, landlords, and tenants to install energy- and water-efficient fixtures and equipment, <u>plant native trees and drought tolerant landscaping and reduce hardscape.</u> (E25)L"	Revise: "Encourage homeowners, landlords, and tenants to install energy- and water-efficient fixtures and equipment <u>and drought-tolerant landscaping.</u> (E25)" Native trees and hardscape are not necessarily related to energy conservation
5.13 Goal 4	Sierra Club	Revise: "Green building practices, <u>including the retrofit and upgrade of existing building shells to include passive solar additions,</u> will be integrated into all development."	Retrofits are addressed in the policies, e.g., E 4.1 and 4.2. "All development" in this goal includes retrofit and upgrade of existing buildings.
5.13 IS 3.5.2	A4NR	Add new IS 3.5.2: " <u>Collaborate with local and state agencies and PG&E to develop an energy efficiency and retraining center at the utility's Diablo Canyon site. A center at the site would enhance and encourage efficiency and hopefully provide ancillary businesses to implement and provide training for reducing county energy consumption. Sharing funding and staff time with PG&E to accomplish state-of-the-art efficiency techniques would be an advantage in budget constrained times. In addition, this strategy would implement the "labor workforce training" being encouraged by the new administration.</u> "	This proposal has potential, but should be discussed with PG&E and other agencies first.
5.13 Policy E 3.6	Agriculture Department	Revise: " Encourage agricultural advisory groups to Promote state-of-the-art energy conservation and efficiency in agriculture."	Agree. Revise: " Encourage agricultural advisory groups to Promote state-of-the-art energy conservation and efficiency in agriculture."
5.13 IS 3.6.1	North County Watch	Revise: "Seek grants and partnerships to sponsor energy education programs to increase awareness in the agricultural community about the benefits of energy	The General Plan is not the appropriate vehicle for making year-to-year budget decisions. The Board of Supervisors approves budgets for County departments through the

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		conservation, energy efficiency, and waste reduction. <u>Direct 5% of the Department of Agriculture Budget to promoting energy conservation in agriculture.</u>	County's annual budget process.
5.13 IS 3.6.2	North County Watch	Add new IS 3.6.2" <u>"Modify the County's Agricultural Preserve Rule of Procedure to require state-of-the art energy conservation and efficiency in agricultural practices for properties applying for a Williamson Act contract."</u>	This appears to be outside of the scope, purpose and intent of the Land Conservation Act.
5.13 Green Building	LOCAC	Residential development should be sensibly-sized. We need a trend towards units with less square footage.	It is difficult to place square-footage limits on residential uses. One possible method to ensure that larger homes do not use a proportional share of energy is to require residences over 3000 square feet, for example, to meet the energy requirements of a 3,000 square-foot house. IS 4.1.2 is to develop a mandatory green building program.
5.14 IS 4.1.2	B.K. Richards	Per IS 4.1.2, California Green Building Standards Code will be the minimum standard for buildings by 2011 (isn't it mandatory?!). How does this standard compare in terms of overall building efficiency to the CEC-sanctioned Title 24, due in August 2009, the Architecture 2030 milestones, LEED, etc.? Our policy suggests that we'll attempt to exceed the California Green Building Standards Code. There is no discussion as to why this is important and why it will be worth the time, money, and political capital to go beyond this standard (or to even study going beyond this standard).	The intent of the local Green Building Ordinance is not to require exceeding Title 24 standards. Instead, the intent is <u>to</u> develop a locally accepted green building standard that reflects local conditions, wishes and public acceptance. There appears to be public interest in developing such an ordinance. Also, relying on existing guidelines such as LEED may be too constraining.
5.14 IS 4.1.3	Agriculture Department	Exclude un-conditioned (non-habitable) agricultural accessory structures from this IS regarding green building checklists.	Agree. Revise: "Prior to adoption and implementation of a Green Building Program, require applications for the following projects to include a green building checklist (LEED, Build It Green, or Green Builder, among others) in their development applications: 1) nonresidential projects with 5,000 or more square feet of gross floor area, 2) residential projects with 3,000 or more square feet of gross floor area or more than four dwelling units (applies to multi-family, mixed-use, planned development, or subdivision projects), 3) land divisions or other residential projects of 5 or more dwelling units.. Use checklists to determine consistency with this Element and to inform environmental impact analyses where applicable. <u>"Agriculturally exempt" structures are exempt from this requirement"</u>
5.14 IS 4.1.5	North County Watch	Recognizing that the greatest heat loss in a building is through its roof, adopt energy standards for ceiling insulation	Title 24 standards adequately address this concern.

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		that equals the efficiency of straw bale wall construction.	
5.15 IS 4.2.1	North County Watch	Revise: "Collaborate with stakeholders to remove regulatory or procedural disincentives to implement green building practices, and identify incentives to encourage green building practices. <u>Authorize a reduction in property tax basis as an incentive.</u> "	The fiscal implications of reducing the property tax needs to be considered by the Board of Supervisors.
5.15 IS 4.1.6	North County Watch	Add new IS 4.1.6: <u>"Enact changes to building codes that facilitate and permit green building practices yet preserve health and safety standards."</u>	The policies and strategies under Goal 4 are all aimed at green building. This proposed strategy is redundant.
5.15 IS 4.2.1	HBA	Setting up a separate green building program instead of following the State's program will mean spending more money on red tape instead of on increasing energy efficiency in the home. Adding unnecessary bureaucracy is a disincentive.	Comment noted, but this is a matter of opinion. This is not the purpose of a green building ordinance.
5.15 IS 4.2.2	HBA	The county's expedited processing for affordable housing projects has been a failure. Until the County demonstrates a real willingness to make this happen, it is a false promise.	It is arguable that expedited processing is a failure. For example, with a motivated, cooperative applicant and professional architect, the People's Self Help Housing project in Avila Beach was successfully expedited in spite of being located in on a difficult site in the coastal zone. This success should be recognized so that it can be duplicated on other projects.
5.16 IS 4.4.2	North County Watch	Revise this IS regarding amending ordinances and plans to mitigate urban heat island effect: "b. Maximizing vegetation, particularly shade trees, to cool air temperatures <u>and hardscapes.</u> c. Reducing <u>roadway width, transportation related hardscapes,</u> the area of large surface parking lots <u>and encourage shade trees.</u> e. Route roads, <u>pedestrian paths, bikeways and driveways around any existing trees.</u> "	b. Unnecessary: maximizing vegetation will cool hardscapes c. Roadway widths have public safety implications; shade trees are already required in parking lots by ordinance e. Rerouting roads, driveways and paths around trees is done by current practice to the extent feasible to protect environmentally sensitive trees and vegetation; however, there are public safety considerations.
5.16 IS 4.4.1	LOCAC	Annual monitoring and reporting of energy use by County Departments may hold them accountable for how they use County resources. This should be included in any design guidelines and/or standards.	Goal 2 addresses energy consumption and reduction by County Departments. Policy E 2.2 specifically directs reductions in energy consumption at all County facilities with annual monitoring and reporting requirements. Refer to page 5.9.
5.17 IS 4.5.1	North County Watch	Revise the 3 rd bullet of this IS: "Amend design plans and building ordinances to encourage the use of the following materials, products, and techniques:... No- or low-VOC furniture, particleboard, and cabinetry <u>discourage the use of formaldehyde building materials</u> "	Formaldehyde is already adequately addressed in this IS.

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5.17 Goal 5	NCAC	Recycling is emphasized and provided for in the county and in implementation strategies, but using less and wasting less is barely referenced	Addressed. Please refer to IS 5.1.1, 5.1.2, 5.2.1, Policy 5.3.
5.17 Goal 5	NCAC	What about industry in the county? Work with businesses (providing incentives) to encourage source reduction and use of recycled materials where possible.	Addressed. Please refer to IS 5.1.1, 5.1.2, 5.2.1, Policy 5.3.
5.17 Goal 5	Sierra Club	Revise: "Recycling, waste diversion, and reuse programs will achieve a 70% diversion rate by 2015 will be <u>increased</u> so as reduce waste to landfill as close to zero as possible."	This would be difficult for the County to achieve. The proposed measures will reduce waste transported the landfills to achieve a minimum 70% diversion rate, with the aim of reducing all waste. A refined diversion rate could be developed in the Climate Action Plan.
5.17 Goal 5	HBA	What is the current diversion rate?	The 2006 diversion rate was approximately 63%. It is the most recent reported rate. It is noted in the margin (top left) on page 5.18.
5.18 IS 5.1.4	A4NR	<u>Add new IS 5.1.4: "Request information from PG&E and the Nuclear Regulatory Commission (NRC), and/or the Environmental Protection Agency (EPA), and/or the Department of Toxic Substances, or other relevant state oversight agencies, to determine if any radioactive material from Diablo Canyon has been classified to the level of "below regulatory concern" since 1995. If the determination is positive, the County should request a copy of all such radioactive material and data on how much radioactivity was measured in this material during transportation, and where the material has been stored since 1995."</u>	This issue should be approached carefully due to pre-emption issues regarding radiological health and safety. Staffing and budget are also concerns if the County is to be involved.
5.18 5.1.4	North County Watch	Add new IS: <u>"Adopt guidelines that ensure that recycling efforts and facilities do not contribute to degradation of the environment."</u>	This IS is not needed for this issue. Recycling facilities are subject to LUO standards, and in many cases, environmental review.
5.18 Policy 5.3	Agriculture Department	Implementation Strategy E 5.3 should reference AGP 13.	Agree. Revise: "Encourage biomass, green waste, and food waste composting facilities... for the proper disposal of locally generated waste in locations where land use conflicts can be minimized. <u>(Refer to Policy AGP 13 in the Agriculture Element).</u> "
5.18 Policy 5.3	NCAC	Encourage biomass, etc....	Comment noted
5.19 Quote	B.K. Richards	The quote in the margin is great, but should apply somewhere in the front of the document and with something other than a solar panel.	The quote and photo actually relate to the next page where the renewable energy policies appear. The format sometimes moves the marginalia to different places. In the Final COSE, the photos and text boxes will be matched directly adjacent to applicable text wherever possible.

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5.19 Policy 5.6	Sierra Club	Add Policy 5.6: "The organic fraction of the municipal solid waste stream will be separated and used for energy production."	This is addressed in Policy 5.3 regarding biomass, green waste and food composting.
5.19 Policy 5.5	North County Watch	Add new item g. "Reuse building materials, use materials with recycled content, or use materials that are derived from sustainable, renewable, and/or local sources to the greatest extent feasible in County buildings. In proposed County projects, encourage construction that:... <u>g. Investigate implementing code changes that accommodate straw bale construction.</u> "	According to the Building Division, this added point is not needed.
5.20 Sidebar	B.K. Richards	This seems an unlikely place to introduce the definition of "Renewable Energy" (sidebar), since the term has been used in many previously in many places.	This page is an appropriate location; it is where the description of the goal and policies on renewable energy begins.
5.20 Goal 6	Sierra Club	Revise: "The use of <u>local</u> renewable energy resources will be increased <u>maximized as part of the development of a portfolio of energy resources.</u> "	Use of the term "local" unnecessarily limits the use of renewable energy. Refer to the response to the fifth "general" comment on page 1 of this table. "Maximizing" renewable energy may entail environmental or other impacts and costs, but should be considered by the Planning Commission.
5.20 Policy 6.1	CARE	Policy E 6.1 Renewable Energy Resources Important public and environmental benefits are advanced by promoting and encouraging energy production from renewable sources. However, it is important to ensure that renewable sources of energy, the technologies used to generate such energy, and the necessary infrastructure and ancillary facilities required for transmission and delivery to consumers are not themselves harmful to the environment and humans. Policies should: 1) encourage thorough environmental impact analysis of every renewable energy source that is proposed within this jurisdiction, including impacts from manufacture, production, construction, processing, storage, and delivery, and 2) ensure that the environmental impacts to sensitive habitat, protected species, wildlife movement corridors and other natural resources are not sacrificed in the production of renewable energy, particularly for projects that do not produce energy for local consumption.	These proposals appear to set even higher environmental standards of review for renewable energy projects than for other projects. This could discourage the construction of such facilities. It is already the policy and practice of the County to do a thorough environmental analysis of all projects subject to CEQA.

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5.20 IS 6.1.1	B.K. Richards	If there are unreasonable barriers or restrictions, it would help to cite examples in the sections on Issues. These would constitute real issues.	Planning and development rules and processes are mentioned in Policy E 6.1. Fees might also be a barrier. Other possible barriers will be investigated.
5.20 IS 6.1.1	HBA	The County has not followed through on this valuable incentive.	This issue has not yet been examined. The IS calls for the elimination of barriers.
5.20 Policy 6.2	CARE	Revise: <u>"Encourage the use of efficient solar technologies and locations which avoid environmental impacts. Encourage and support the development of solar power and other renewable energy systems as commercial energy enterprises where visual and environmental impacts can be mitigated. Evaluate proposed renewable commercial energy facilities by balancing the need for and locations of renewable sources of energy against the open space, scenic, habitat, and agricultural value of the locations of proposed facilities. (E39 revised)"</u>	It is not appropriate to try to avoid all environmental impacts. The existing language proposes a reasonable balancing of competing goals and resources.
5.20 IS 6.2.1	CARE	Revise: <u>"Encourage the use of project locations with minimal or previously compromised environmental resources such as former mine sites or disturbed urban areas such as parking lots. Evaluate large-scale commercial solar projects (i.e. over 10 MW) to favor technologies that maximize the facility's power production and minimize the physical effects of the project. Physical effects include, but are not limited to, noise, area of land disturbance and water use."</u>	Projects over 10 MW cannot be placed in parking lots. Focusing on previously disturbed sites or those with minimal environmental resources may unnecessarily and severely limit the amount of potential sites, which to start with, have to be located in areas of high solar exposure. Practically speaking, it is likely that few sites could meet these proposed criteria. The County should consider all types of commercial solar and other renewable energy projects on suitable sites, evaluating such projects using the balancing test in Policy E 6.2 and the criteria in IS 6.2.1, as applicable.
5.20 IS 6.2.2	A4NR	Add IS 6.2.2: <u>"Collaborate with local and state agencies and Pacific Gas & Electric Company (PG&E) to develop renewable energy resources at the utility's Diablo Canyon site. PG&E, local colleges, state agencies, local, state and federal representatives should encourage and support studies to work with the public to:</u> <u>Determine which renewable energy resources (commercial and pilot programs) are possible at Diablo Canyon.</u> <u>Develop a portion of the site to be used for energy efficiency think tank</u> <u>Include a retraining center as Diablo Canyon is transitioned from an aging nuclear generator to a renewable energy leader.</u>	Agree with the general idea of pursuing the development of renewable energy at existing energy-generating locations. Add new IS 6.2.2: <u>"Use of existing energy-generating sites</u> <u>Collaborate with local and State agencies and energy facility operators to develop renewable energy resources at existing energy generating sites.</u> Policy E 6.2 and proposed new IS 6.2.2 address renewable energy systems other than solar systems. Revise title of Policy E 6.2: "Commercial solar power <u>and other renewable energy systems.</u> "

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5.20 Policy E 6.3 IS 6.1.1	CARE	<p>Revise: “<u>Local renewable energy resources development</u> Promote the development of <u>local sustainable energy sources and small scale renewable energy projects through streamlined planning and development rules, codes, processing, and other incentives.</u> (E37 revised)” [This is Policy E 6.1, revised as shown]</p> <p>“Develop renewable energy resources in the county, including the safe, effective, and efficient use of small wind energy systems, solar power systems, passive solar buildings, and other renewable energy systems designed for onsite home, farm, and commercial use.”</p> <p>Revise IS 6.1.1: “Eliminate barriers to <u>small scale renewable energy use in the County</u> Revise County policies and regulations as needed by the end of 2011 to eliminate barriers to or unreasonable restrictions on the use of <u>small scale renewable energy designed for onsite home, farm, and commercial use.</u></p>	<p>These proposals discourage and create barriers to large-scale renewable energy development, which should also be encouraged. Such commercial-scale projects can benefit the entire county, as well as 35 million residents of the state. They need to be located where the resources are found.</p>
5.21 IS 6.5.1	A4NR	<p>Add new IS 6.5.1 to request that PG&E provide information on the possibility of geothermal generation on the Diablo Canyon site.</p>	<p>Add new IS 6.5.1: “<u>Existing energy facility sites</u> <u>Collaborate with operators of existing energy facilities to study the potential for geothermal development.</u>”</p>
5.21 Policy E 6.7	B.K. Richards	<p>A discussion of co-generation for energy (thinking of the case of localized electricity and heat generation from natural gas turbines) should not be in a section on renewable energy.</p>	<p>This policy is part of the consolidation of the existing 1995 Energy Element. “Renewables” is where the policy resided in that Element.</p>
5.21 Policy E 6.8 IS 6.8.1		<p>Add new Policy E 6-8: <u>Wind Resources Encourage wind development on the coast.</u></p> <p>Add new IS 6-8.1: <u>Collaborate with local and state agencies and Pacific Gas & Electric Company (PG&E) to develop renewable energy resources at the utility’s Diablo Canyon site. PG&E is currently investigating wind and possibly other renewable sources of generation at Diablo Canyon. Review results of PG&E’s recent wind investigation report for the Diablo site as soon as it is released.</u></p> <p>Add new Policy: <u>Encourage wind generation offshore.</u></p>	<p>Agree with the general idea of encouraging development of wind power in appropriate locations. Revise Policy E 6.2, “Commercial solar power <u>and other renewable energy systems</u>” to include the following language: “<u>Encourage the development of wind power in areas where wind speeds make commercial wind power feasible. Focus should be placed on locations near existing power facilities and existing transmission lines.</u>”</p> <p>Add new IS 6.2.2: “<u>Use of existing energy-generating sites</u> <u>Collaborate with local and State agencies and energy facility operators to develop renewable energy resources at existing energy generating sites.</u>”</p>

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		Add new IS: <u>Encourage support for Congresswoman Capps' offshore wind bill.</u>	
5.22 IS 7.1.1	CARE	<p>Revise IS 7.1.1 regarding energy facility design, siting and operation standards, under "General":</p> <p>4) Employ the best reasonably achievable techniques available to <u>avoid</u> mitigate impacts to environmentally sensitive areas such as wetlands, animal or bird refuges, <u>wildlife movement corridors</u> or habitat of species of special concern. Avoid impacts to habitat of rare, threatened, or endangered species. (E29.6)</p> <p>5) Within a sensitive view corridor, scenic, or recreational area, employ the best available techniques to <u>avoid or otherwise</u> mitigate impacts related to these resources. (E2 Guideline 9.7)</p> <p>6) If the proposed location visually impacts views of the site from public roads or lands, prepare a screening plan to minimize visual impacts. <u>Lighting should be limited to quantities required to meet applicable safety standards.</u> (E Guideline 29.8 revised)</p>	<p>The proposed revisions add detail that is not necessary in a policy document, and that may be intended to address specific projects. Unintended consequences may result. The County should encourage a variety of renewable energy projects, where appropriate, that benefit the county and State as a whole.</p>
5.23 IS 7.1.1	Agriculture Department	Implementation Strategy E 7.1.1 (8) should include reference to avoiding or otherwise mitigating impacts to agricultural resources.	Agree. Revise: "(8) Avoid or otherwise mitigate impacts to significant <u>agricultural</u> , archaeological, paleontological, or historic resource sites. (E Guideline 29.10)"
5.23 IS 7.1.1	Agriculture Department	Several thousand acres of agricultural land have been identified for future conversion to alternative energy facilities. Alternative energy also can be generated within urban areas, eliminating impacts to agricultural resources. Recommend a policy to encourage locating alternative energy facilities in urban areas.	The County should encourage both large commercial energy facilities that need large amounts of land (that as a result would likely be located in rural and agricultural areas) and small-scale renewable energy facilities that can be located in more densely developed urban areas.
Appendix A5.12	B.K. Richards	There is a preamble to a discussion of major issues at the bottom of this page, but no issues are discussed.	The issues extend through page 5.16
Appendix	B.K. Richards	The Appendix has discussion of a variety of green building programs, but does not provide background on the program actually chosen as the baseline for a goal in the document, the California Green Building Standards Code. It seems important to describe when this Code becomes mandatory (2010) and what impact it will have. Are there amendments that we need to consider? How tough is this standard relative to	A discussion of the proposed California Green Building Code will be added or a link provided.

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		<p>other “standards”. See http://www.greenbiz.com/news/2008/07/18/california-adopts-green-buildingcode-all-new-construction. Also, there is a lot in the news about State incentive programs, “million solar roofs”, etc. It would seem that this should get discussed here, as they apply to San Luis Obispo County.</p>	